

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION**

**TROY H. BRADFORD and GLORIA BRADFORD,  
Individually and as Class Representatives on Behalf  
Of All Similarly Situated Persons; and BOOKS, ETC.,  
By and Through TROY and GLORIA BRADFORD,  
Class Representatives on Behalf of All Those  
Similarly Situated**

**PLAINTIFFS**

**VS.**

**NO. 4:05-cv-4075 HFB**

**UNION PACIFIC RAILROAD COMPANY,  
A Delaware Corporation, and J. L. GORDAN,  
An Arkansas Resident**

**DEFENDANTS**

**MOTION FOR SUBSTITUTION OF COUNSEL**

Comes now the Defendant, Union Pacific Railroad Company, and for its Motion for Substitution of Counsel, prays:

1. This action has been defended on behalf of Union Pacific Railroad Company by Kevin A. Crass and Scott H. Tucker of Friday, Eldredge, & Clark, LLP.
2. Union Pacific Railroad Company requests that George L. McWilliams, P.C. and Sean F. Rommel of Patton Roberts McWilliams & Capshaw located at Century Plaza, Suite 400, 2900 St. Michael Drive, Texarkana, Texas 75503 be substituted as counsel of record in place of Kevin A. Crass and Scott H. Tucker of Friday, Eldredge & Clark, LLP.
3. Granting this Motion will not delay the proceedings in this case and will not work any prejudice on the plaintiffs.

WHEREFORE, the Defendant, Union Pacific Railroad Company, prays that its Motion for Substitution of Counsel be granted, and for all other relief to which it is entitled.

Respectfully Submitted,

FRIDAY, ELDREDGE & CLARK, LLP  
KEVIN A. CRASS (84029)  
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By: /s/ Kevin A. Crass  
KEVIN A. CRASS

**PATTON ROBERTS McWILLIAMS & CAPSHAW**  
GEORGE L. McWILLIAMS  
SEAN F. ROMMEL  
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Texarkana, Texas 75503  
(903-334-7000)

Attorneys for Defendant,  
Union Pacific Railroad Company

BY: /s/ George M. McWilliams  
GEORGE M. McWILLIAMS

**CERTIFICATE OF SERVICE**

I, Kevin A. Crass, hereby certify that on November 3, 2005, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

- **R. Gary Nutter**  
rgnutter@dnmlawfirm.com shartline@dnmlawfirm.com
- **Attorney for Plaintiffs**
- 
- **Roger W. Orlando**  
roger@orlandokopelman.com matt@orlandokopelman.com
- **Attorney for Plaintiffs**

I, Kevin A. Crass, hereby certify that on November 3, 2005, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, and that a copy of the document and Notice of Electronic Filing (NEF) were forwarded via United States Mail, to the following non CM/ECF participant:

**M. David Karnas**  
Bellovin & Karnas, P.C.  
100 North Stone Avenue, Suite 1105  
Tucson, AZ 85701  
Attorney for Plaintiffs

GEORGE L. McWILLIAMS  
SEAN F. ROMMEL  
**PATTON ROBERTS McWILLIAMS & CAPSHAW**  
Century Plaza, Suite 400  
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Texarkana, Texas 75503

/s/ Kevin A. Crass  
\_\_\_\_\_  
KEVIN A. CRASS